

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOSE ANTONIO HAU and
BIBIANA KURI OTERO

Plaintiffs,

vs.

PRODIGY NETWORK, LLC a
Delaware limited liability company,
PRODIGY SHOREWOOD
INVESTMENT MANAGEMENT,
LLC, and 17 JOHN PREFERRED,
INC., a Delaware corporation,

Defendants.

Case No. 1:20-cv-02318-PGG-KNF

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the Declaration of Steven M. Lucks, dated March 8, 2021, plaintiffs Jose Antonio Hau and Bibiana Kuri Otero (collectively “Plaintiffs”) shall move this Court before the Honorable Paul G. Gardephe, United States District Judge, at a date and time to be set by the Court, for an order—pursuant to this Court’s February 17, 2021 order, ECF No. 76, directing 17 John Street Property Owner LLC (“17 John Owner”) to respond to Plaintiffs’ information subpoena (“Order”), and Local Rule 83.6—finding 17 John Owner in contempt of the Order and further ordering: (1) such civil or criminal penalties against 17 John Owner as this Court deems just and (2) that Plaintiffs be awarded their reasonable attorneys’ fees incurred in connection with their enforcement of the Order.

Dated: New York, NY
March 8, 2021

s/ Steven M. Lucks
Steven M. Lucks
Zachary W. Silverman
FISHKIN LUCKS LLP
277 Broadway, Suite 408
New York, NY 10007
(646) 755-9200

slucks@fishkinlucks.com
zsilverman@filskinlucks.com

David B. Rosemberg (*pro hac vice*)
ROSEMBERG LAW
20200 W. Dixie Hwy., Suite 602
Aventura, FL 33180
(305) 602-2008
david@rosemberglaw.com

Attorneys for Plaintiffs